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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM A. HAZZARD,

Plaintiff

v.

TIMOTHY CURTIS, MACK
MCMURRAY, AFSCME DISTRICT
90, AND THE HARRISBURG
SCHOOL DISTRICT,

Defendants

No. 1:CV-00-1758

Judge Rambo

JURY TRIAL DEMANDED

MOTION FOR LEAVE TO FILE SUMMARY JUDGMENT
BRIEF IN EXCESS OF FIFTEEN PAGES

NOW COMES, Defendants Harrisburg School District and Timothy Curtis,
by and through their attorneys, Rhoads & Sinon LLP, and file the within Motion
for Leave to File Summary Judgment Brief in Excess of Fifteen Pages, as follows:

1. This case is a “reverse discrimination” matter against multiple Defendants. In his Complaint, the Plaintiff has alleged several causes of action against said Defendants resulting from Plaintiff not being “promoted” into a new Head Custodian job within the Defendant Harrisburg School District.

2. The Parties have developed a voluminous record of evidence and engaged in extensive discovery, including the deposition of numerous witnesses in this case.

3. Briefs in support of or in opposition to summary judgment motions are limited to fifteen pages without leave of court pursuant to this Court’s Order dated June 21, 2001 (and as amended as to filing date by this Court’s Order dated November 27, 2001).

4. In order to fully present Defendant Curtis’ and Harrisburg School District’s Motion for Summary Judgment, it is essential that Defendants file a Brief in excess of fifteen pages.

5. Defendants will be prejudiced if they are unable to assert all of their arguments in support of Defendant Curtis’ and Defendant Harrisburg School District’s Motion for Summary Judgment because of the page limitation.

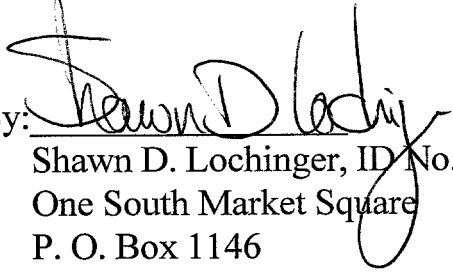
6. Defendant Curtis' and Defendant Harrisburg School District's Brief, however, will not exceed thirty pages.

7. Counsel for Defendants McMurray and AFSCME District 90 and counsel for Plaintiff concur in this Motion.

WHEREFORE, Defendants respectfully request that this Honorable Court grant the within Motion for Leave to File a Summary Judgment Brief in Excess of Fifteen Pages, but limited to thirty pages.

Respectfully submitted,

RHOADS & SINON LLP

By: 
Shawn D. Lochinger, ID No. 52795
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Attorneys for Defendant Harrisburg School
District and Defendant Timothy Curtis

Date: 2/8/02

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM A. HAZZARD,

Plaintiff

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MCMURRAY, AFSCME DISTRICT
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CERTIFICATE OF CONCURRENCE

The undersigned certified that Eric M. Fink, Esquire, counsel for Defendants McMurray and AFSCME District 90 and Don Bailey, Esquire, counsel for Plaintiff, William A. Hazzard, concur regarding the within Motion.

Respectfully submitted,

RHOADS & SINON LLP

By: 

Shawn D. Lochinger, ID No. 52795
One South Market Square
P. O. Box 1146
Harrisburg, PA 17108-1146
(717) 233-5731

Attorneys for Defendant Harrisburg School
District and Defendant Timothy Curtis

Date: 2/8/02

CERTIFICATE OF SERVICE

I hereby certify that on Friday, February 8, 2002, a true and correct copy of the foregoing "Motion for Leave to File a Summary Judgment Brief in Excess of Fifteen Pages" was served by means of United States mail, first class, postage prepaid, upon the following:

Don Bailey, Esquire
4311 N. 6th Street
Harrisburg, PA 17110

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Russell D. Fuller